

# Exhibit O

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CAROL KERKHOF, et al., )  
 )  
 Plaintiff, ) IN THE CIRCUIT COURT FOR  
 ) MONTGOMERY COUNTY  
 vs. )  
 ) CASE NO. 439392-V  
 BRENNTAG NORTH AMERICA )  
 INC., et al., ) JUDGE: JILL R. CUMMINS  
 )  
 Defendants. )  
 \_\_\_\_\_ )

## DEPOSITION OF

WILLIAM E. LONGO, PhD

November 5, 2018

10:50 a.m.

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Suite 200  
Johns Creek, Georgia

Debra R. Luther, RMR, CRR, CCR-B-881

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1 have it in the right refractive index solution to  
2 show the appropriate colors, I would not call it.

3 **Q. You need to do more testing on it?**

4 A. Well --

5 **Q. Or is what's been done already concluded**  
6 **that?**

7 A. No. We have to do more testing on it  
8 where we would go back and actually use the  
9 refractive indices appropriate for that.

10 But if you look in the McCrone or any of  
11 these books where they show you what it should look  
12 like, it looks just like that. It's a very large  
13 bundle of chrysotile.

14 **Q. Other than that bundle, which you've**  
15 **discussed, are there any other findings using PLM**  
16 **where you've found either a fiber or a bundle of**  
17 **chrysotile?**

18 A. No.

19 **Q. Would PLM be the most accurate of the**  
20 **three tests you've used to identify chrysotile if it**  
21 **was there?**

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1           A.       No.    TEM would be.   All the chrysotile  
2        findings from the historical documents of Johnson &  
3        Johnson, it's only been found by TEM.

4           **Q.       Using a different preparation method,**  
5       **then; right?**

6           A.       Well, just using the standard TEM method,  
7        long method.

8           **Q.       Have you gone back to do any TEM long**  
9       **method testing to see whether you found chrysotile in**  
10      **Johnson & Johnson Baby Powder?**

11          A.       Not yet.

12          **Q.       It's on your list to do?**

13          A.       Well, we have an automated TEM, and we're  
14        working on it to fully automate it so that you can  
15        put a grid in -- and probably won't have that  
16        technology worked out in our lab for about a year --  
17        where you just put a grid in and let it run.

18          **Q.       Are there any other changes or upgrades in**  
19       **equipment you have going on or planned right now?**

20          A.       Well, we've got this new Hitachi TEM, but  
21        we've had it for a year -- about a half a year.   And

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C E R T I F I C A T E

2

3 STATE OF GEORGIA:

4 COUNTY OF GWINNETT:

5

6 I hereby certify that the foregoing  
7 transcript was taken down, as stated in the  
8 caption, and the questions and answers thereto  
9 were reduced to typewriting under my direction;  
10 that the foregoing pages 1 through 221 represent  
11 a true, complete, and correct transcript of the  
12 evidence given upon said hearing, and I further  
13 certify that I am not of kin or counsel to the  
14 parties in the case; am not in the regular  
15 employ of counsel for any of said parties; nor  
16 am I in anywise interested in the result of said  
17 case.

18 This, the 8th day of November 2018.

19

20 DEBRA R. LUTHER, B-881  
Georgia Certified Court Reporter

21